

**FINEOTEX CHEMICAL LIMITED****POLICY FOR DETERMINING MATERIALITY FOR
DISCLOSURE OF INFORMATION**

[Pursuant to Regulation 30 of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

<i>Adopted on</i>	<i>12th February, 2016</i>	<i>Policy Determining Materiality for Disclosure of information - 1</i>
<i>Revised on</i>	<i>27th January, 2023</i>	<i>Policy Determining Materiality for Disclosure of information – 1.1</i>
<i>Revised on</i>	<i>04th August, 2023</i>	<i>Policy Determining Materiality for Disclosure of information – 1.2</i>

I. Legal Framework

This Policy for Determination of Materiality of Events or Information is aimed at providing guidelines to the management of Fineotex Chemical Limited, to determine the materiality of events or information, which could affect investment decisions and ensure timely and adequate dissemination of information to the Stock Exchange(s) (as hereinafter defined)

This Policy has been formulated in accordance with the guidelines laid down by Securities Exchange Board of India under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**the Listing Regulations**”), with respect to disclosure of events and information.

II. Objective of the Policy

The objective of this Policy is to serve as a guiding charter to the management to ensure that timely and adequate disclosure of events or information are made to the investor community by the Company under the Listing Regulations, to enable them to take well informed investment decisions with regard to the securities of the Company.

III. Disclosure Requirements

The Company shall disclose events specified in Para A of Part A of Schedule III as specified in Regulation 30 of the Listing Regulations as they are deemed to be material events.

Further, the Company shall make disclosures of events as specified in Para B of Part A Schedule III based on the application of guidelines for materiality as described in Regulation 30(4) of the Listing Regulations.

Guidelines for determining Materiality of Events or Information:

Materiality has to be determined on case to case basis depending on specific facts and circumstances relating to the information/event. For determination of materiality of information/events the Company shall consider the following criteria for determination of materiality of events/ information:

- (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or
- (b) the omission of an event or information is likely to result in significant market reaction if the said omission came to light at a later date;
- (c) The omission of an event or information, whose value or expected impact in terms of value, exceed the lower of the following:



- two percent of turnover, as per the last audited consolidated financial statement of the Company;
 - two percent of net worth, as per the last audited consolidated financial statement of the Company, except in case the arithmetic value of the networth is negative;
 - five percent of the average of absolute value of profit or loss after tax, as per the last three consolidated financial statements of the Company.
- (d) in case where the criteria specified in sub-clauses (a), (b) and (c) are not applicable, an event/information may be treated as being material if in the opinion of the Board of Directors of listed entity, the event / information is considered material

The Company shall first disclose to the Stock Exchanges(s) all events or information which are material in terms of the provisions of the Listing Regulations as soon as reasonably possible and in any case not later than the following:

- Thirty minutes from the closure of the meeting of the Board of Directors in which the decision pertaining to the event or information has been taken;
- Twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
- Twenty Four hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.

Disclosures with respect to events for which timelines have been specified in Part A of Schedule III shall be made within such timelines. In case disclosure is made after the timelines specified under the Listing Regulations, the Company shall along with such disclosure provide the explanation for the delay. Regular updates, if required, shall be made with relevant explanations. The Company shall also disclose all such events or information with respect to subsidiaries which are material for the Company. The Company shall confirm or deny any reported event or information to Stock Exchange.

The Company shall disclose major developments that are likely to affect business and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

Further, all the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel and employees of a the Company or of its holding, subsidiary and associate company, who are parties to the agreements such as shareholder agreement, joint venture agreement, family settlement agreement [to the extent that it impacts management and control of the listed entity], agreement/treaty/contract with media companies which are binding and not in normal course of business shall inform the Company about the agreement to which the Company is not a party, within two working days of entering into such agreements or signing such agreement revision(s) or amendment(s) and termination(s) thereof.



IV. Disclosure Obligation

Pursuant Regulation 30 of SEBI (LODR) Regulations, 2015, the following Key Managerial Personnel (KMPs) are hereby severally authorized by Board of Directors for the purpose of determining materiality of an event or information and for the purpose of making disclosures to Stock Exchange(s) (“Authorized Person(s)”)

- a) Managing Director
- b) Executive Directors
- c) Company Secretary

Details of above KMPs shall be also disclosed to the Stock Exchange(s) and as well as on Company’s website. The materiality of events outlined in this Policy is indicative in nature. The authorized officers of the Company shall exercise their own judgment while assessing and determining the materiality of events associated with the Company

V. Website Disclosures and Archival

The event/information disclosed to the stock exchanges under this policy shall be placed on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company

VI. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.